

EXHIBIT J

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

RYAN C. HENRY, individually and on behalf
of all other similarly situated employees,

Plaintiffs,

v.

QUICKEN LOANS INC., a Michigan corporation, and
DANIEL B. GILBERT, personally and individually,

Defendants.

Civil Action No.: 04-CV-40346

Honorable Paul V. Gadola

Magistrate Judge Steven D. Pepe

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**DECLARATION OF RACHHANA T. SREY IN SUPPORT OF REPLY
MEMORANDUM TO MOTION FOR RELIEF FROM COMPUTER FORENSICS
EXPERT'S INVOICE**

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Rachhana T. Srey, being duly sworn, states as follows:

1. I am an attorney at the law firm of Nichols Kaster & Anderson, PLLP in Minneapolis, Minnesota. I am competent to testify about the matters contained in this declaration.

2. I submit this declaration in support of Plaintiffs' Reply Memorandum in Support of Motion for Relief From Computer Forensics Expert's Invoice.

3. On August 17, 2007, I emailed defense counsel, Robert C. Varnell, requesting an update on the email search process. Mr. Varnell did not respond to my email.

4. During the entire email search process, Defendants never communicated with me any instructions they gave to Mark Lanterman, the computer forensic expert that fell outside of the scope of the July 10, 2007 letter or the parties' agreement. This includes the additional direction they gave to Mr. Lanterman to screen "nested emails" for modified privileged terms.

5. On or about September 14, 2007, I spoke with Mr. Varnell about, among other things, the email production. Mr. Varnell never mentioned anything to me about the modified search terms or the emptied Plaintiff mailboxes during this conversation.

6. On September 19, 2007, I again spoke with Mr. Varnell regarding the Plaintiff emails. Again, Mr. Varnell did not mention anything to me about the over-exclusive search terms or repopulated Plaintiff mailboxes during this conversation.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: 1.25.2008

s/Rachhana T. Srey
Rachhana T. Srey